

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

TERRI L. BEAUMONT,

Plaintiff,

v.

FAY SERVICING,

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:

CIVIL ACTION

Case No. 2:16-cv-0378-AJS

**DEFENDANT’S MOTION TO DISMISS
THE COMPLAINT PURSUANT TO FED. R. CIV. P. 12(b)(6)**

Defendant, Fay Servicing, LLC (“Fay Servicing”), hereby moves pursuant to Fed. R. Civ. P. 12(b)(6) to dismiss the Complaint for the reasons stated in the accompanying Memorandum of Law, which is incorporated herein as if fully set forth at length. A proposed form of Order is attached.

Respectfully submitted,

/s/ Andrew K. Stutzman

Andrew K. Stutzman, Esquire
Stradley Ronon Stevens & Young, LLP
2005 Market Street, Suite 2600
Philadelphia, PA 19103
Phone: (215) 564-8000
E-mail: astutzman@stradley.com

*Attorneys for Defendant,
Fay Servicing, LLC*

Dated: May 17, 2016